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FEBRUARY 22, 2018

Re: Cook v. City of N.Y., No. 15 Civ. 6559 (ILG) (CLP)

Dear Judge Pollak:

I am Plaintiffs' Counsel in the above-captioned Section 1983 action alleging that NYPD Defendants and ACS Defendants violated Plaintiffs' constitutional rights. Docket No. 35. I write to provide the Court with a joint status letter. As the Court will recall, the Parties' next conference is scheduled for April 6, 2018. We believe that the status report provided herein will permit us to certify the close of discovery on that date and proceed to post-discovery scheduling.

The Parties have scheduled the deposition of Defendant Wright on March 27, 2018. The Court may recall that Ms. Wright was away, but the Parties have learned that she will be in the City again by that date and available to sit.

One final status update relates to the Court's recent so-ordered subpoena for Queens County Family Court transcripts and records relating to the case. The subpoena had a return date of February 16, 2018. The pre-existing paper records were timely delivered, but the court reporter preparing the transcripts has needed more time due to an issue with court audio files. At this time Plaintiffs' Counsel is learning a realistic estimated production date and does not view the delayed production to present an enforcement issue needing the Court's attention. Meanwhile, the Parties have agreed to complete two other depositions in mid-March 2018 once the transcripts are in hand and we have held dates between us for that purpose. Plaintiffs' Counsel will file a letter motion with the Court on or before March 2, 2018, if there is an unexpected problem regarding the satisfaction of the subpoena.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Lozar".
Ryan Lozar
Attorney for Plaintiffs